

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LEO SYNORACKI, on behalf of himself and all
others similarly situated

Plaintiff,

v.

ALASKA AIRLINES, INC., *et al.*,

Defendants.

No. 2:18-cv-01784-RSL

**STIPULATED MOTION AND
ORDER TO EXTEND TIME
FOR DEFENDANTS TO RESPOND
TO PLAINTIFF'S
MOTION FOR CLASS
CERTIFICATION**

I. INTRODUCTION

The parties, by and through their undersigned counsel, jointly submit this stipulated motion to extend Defendants' deadline to file their response (the "Response") to Plaintiff's Motion for Class Certification (Dkt. No. 40) (the "Motion"), currently due April 27, 2020, by 14 days to May 11, 2020 and for Plaintiff's Motion, currently noted for May 1, 2020, to be noted for consideration on May 15, 2020. Good cause exists for this extension because Defendants are currently reviewing Plaintiff's putative classes and proposed class definitions along with accompanying materials, and additional time may be helpful in narrowing the scope of disputed issues to be addressed in Defendants' Response.

II. STATEMENT OF FACTS

In this civil class action brought pursuant to the Uniformed Services Employment and Reemployment Rights Act of 1994, 38 U.S.C. § 4301 *et seq.*, Plaintiff seeks to certify two classes

1 of pilots employed by Defendants who allegedly did not accrue vacation or sick time while on
2 periods of military leave.

3 This case was filed in December 2018. Trial is set for December 7, 2020. Plaintiff filed
4 the Motion on April 7, 2020, which is noted for a hearing on May 1, 2020. Defendants' Response
5 is currently due April 27, 2020.

6 III. ARGUMENT

7 The Court may extend a party's deadline to respond to a motion where good cause exists.
8 Fed. R. Civ. P. 6(b)(1)(a); *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1259 (9th Cir. 2010)
9 ("[R]equests for extensions of time made before the applicable deadline has passed should
10 normally . . . be granted in the absence of bad faith on the part of the party seeking relief or
11 prejudice to the adverse party.") (internal quotation marks omitted).

12 The parties stipulate that good cause exists to extend Defendants' time to respond to
13 Plaintiff's Motion by 14 days because Defendants are currently reviewing Plaintiff's putative
14 classes and proposed class definitions along with accompanying materials, and additional time
15 may be helpful in narrowing the scope of disputed issues to be addressed in Defendants' Response.
16 (*See* Dkt. No. 40 at 4.) Specifically, Defendants and Plaintiff have been in communication to
17 determine the scope of disputed issues regarding Plaintiff's proposed putative classes and class
18 definitions, and these discussions could potentially narrow the issues that will be addressed by
19 Defendants' Response and will need to be considered by this Court. Therefore, good cause exists
20 for a short, two-week extension that will allow the parties additional time to discuss Plaintiff's
21 proposed class definitions.

22 This is the first request by the parties for an extension of time for Defendants to file a
23 Response to Plaintiff's Motion
24
25
26

V. CONCLUSION

For the foregoing reasons, the parties respectfully move the Court to extend Defendants' time to file a Response to Plaintiff's Motion from April 27, 2020 to May 11, 2020, and to notice Plaintiff's Motion for May 15, 2020.

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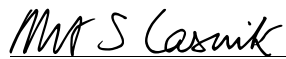
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ORDER

Based on the foregoing stipulation, the Court ORDERS that Plaintiff's motion for class certification (Dkt. No. 40) is noted for hearing on May 15, 2020, and Defendants' response to Plaintiff's motion, if any, shall be filed by May 11, 2020.

Dated this 24th day of April, 2020.



The Honorable Robert S. Lasnik
United States District Court Judge